

PM USA Records Management



the record

QUICK GUIDE

The PM USA Records Management Program involves **4 key concepts**:

- ▶ Primary and Transient Records
- ▶ Disposal Suspension
- ▶ Quality Records
- ▶ Security Classifications



What are Primary and Transient Records?

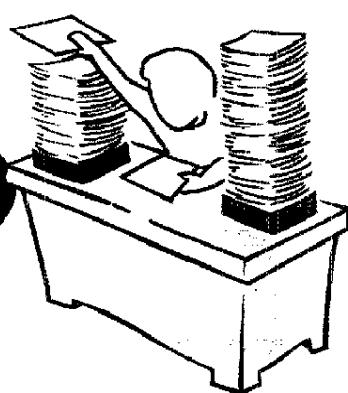
| DEFINITION | Primary Records — the significant business records with future value to the company | Transient Records — all other records that normally have no value to the company after their use |
|-------------------|---|---|
| EXAMPLES | <ul style="list-style-type: none">● records that demonstrate accountability● records that have value to the business beyond the individual that created them● records that are required by applicable laws, regulations, Quality System procedures/work instructions, or business policies/procedures● records maintained for historical purposes● records received from non-PM USA business units, contractors, vendors and regulatory agencies where you are the principal recipient of records deemed primary to the company | <ul style="list-style-type: none">● identical "circulation" or "working" copies of Primary Records● interim drafts● conversational e-mail, telephone message slips● to-do lists, personal reminder notes● periodicals generated outside of the company● blank forms● other items that normally do not have any value to the company unless they are under Disposal Suspension |
| MANAGED BY | — the department whose function is most closely associated with the record | — individual employees |
| RETENTION | — will be retained according to the retention period identified on the Primary Records List (unless they are subject to Disposal Suspension) | — should be disposed of as soon as they are no longer needed for active use (unless they are subject to Disposal Suspension) |

In work areas, Primary Records will be found in one of 3 places: Departmental Central files, ERMS, and Databases.

I've created a record ... now what?

In work areas, Primary Records will be found in one of three places: Department Central files, ERMS, and Databases

Significant business records with future value?



YES
Primary Record

Is it Electronic?

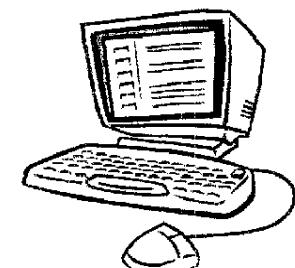
NO

NO
Transient Record

YES

Under Disposal Suspension?

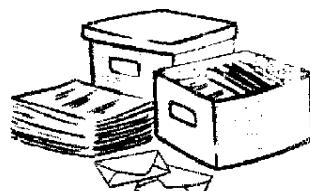
NO



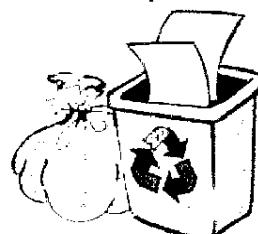
Archive in ERMS*



Record Coordinator Files*



Print and put in box



Dispose of properly when no longer needed

*Primary Records may also be subject to Disposal Suspension



What are Quality Records?

- They are the proof that we followed instructions detailed in procedures, work instructions or quality plans.
- They prove that we are controlling the quality of our products and processes so that our products meet specifications and other requirements.

There are rules for the completion and correction of Quality Records:

COMPLETION: No blank sections
Legible and accurate
Created in ink
Some records require a signature

CORRECTION: Single line through
Initial
Date
Record correct information



What is Disposal Suspension?

For certain types of records, including electronic records (e-mail and attachments), disposal in the ordinary course is "suspended", usually for litigation reasons. You must retain these records until you are notified that **Disposal Suspension** has been lifted. Whether a record must be retained depends upon whether it falls within certain categories of information. If a record falls within one of these categories, it is considered to be "**disposal-suspended**," and must be managed in accordance with Disposal Suspension business rules. **Violation of Disposal Suspension rules could expose you and the Company to serious legal consequences.**

The following are some examples of topics under Disposal Suspension:

- ▶ research and development concerning tobacco or tobacco products
- ▶ related health issues, including ETS and fire safety
- ▶ chemical properties of tobacco, tobacco products or smoke
- ▶ use of pesticides or genetic engineering in tobacco growth
- ▶ formulas, recipes, or filter composition
- ▶ tobacco processing and testing
- ▶ cigarette manufacturing processes and methodologies concerning cigarettes manufactured and sold in the United States
- ▶ marketing and sale of tobacco or tobacco products in the United States (including advertising, promotions and consumer preferences)
- ▶ marketing plans and strategies (anywhere) (discussing which markets or segments to target and ways of reaching them)
- ▶ marketing materials (anywhere) that discuss health claims or relate to youth smoking
- ▶ government regulation of tobacco products in the United States (including lobbying efforts)
- ▶ records retention, storage and disposal policies or practices
- ▶ routing policies for communications between facilities of any Philip Morris tobacco company in the United States and laboratories located outside the United States
- ▶ any other specific topics of current disposal suspension notices

Retain all records that previously have been collected and stamped, marked or coded by attorneys (multi-digit stamped numbers, codes such as "C1", "C3", or red dots).

What do I do with records under Disposal Suspension?

- ▶ **Primary Records** should be identified as being under Disposal Suspension when created. Once identified as such in the Records Management Process, there are systems in place to assure their retention.
- ▶ **Transient Records** should be maintained separately from all other records. Employees should utilize a Disposal Suspension box under their desk to retain all transient records under Disposal Suspension. All electronic transient records (such as e-mails, e-mail attachments, agendas, presentations, etc.) that are under Disposal Suspension should be printed and put into the box.

Your Records Coordinator can assist you with getting a Disposal Suspension box and transferring it to the Records Management Department when full.



What are Security Classifications?

All Company records, regardless of form or media, are Company assets. Unless they are publicly available, you must take appropriate measures to protect the information they reflect from unauthorized disclosure, particularly to individuals outside the Company.

Most Company records will receive no specific security classification, but when needed there are only two:

CONFIDENTIAL — Records that are intended to be seen only by specific Company employees or business partners under controlled circumstances. Only the function/department manager (or higher level) responsible for the record can authorize the use of this security classification. **Confidential Records should be kept in a locked drawer, cabinet or office when unattended.** Unless under Disposal Suspension, dispose of by shredding or electronic equivalent.

RESTRICTED — Highly confidential records, the inappropriate dissemination of which, even within the Company, could cause significant competitive harm to the Company. Only the function/department Vice President (or higher level) responsible for the record can authorize the use of this security classification. **Restricted Records should be kept in a locked drawer, cabinet or office when unattended.** Unless under Disposal Suspension, dispose of by cross-cut shredding or electronic equivalent.



Where do I go to learn more?

- Refer to the **Records Management** web site. Go to the **PM USA** intranet and (1) click on **Reference**, (2) select **Records Management**.
- Also, contact your area **Records Coordinator** to answer any questions.